

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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**UNITED STATES OF AMERICA**

**v.**

**BRUCE A. BROWN**

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**No. 1:20-cr-10041-PBS**

**DEFENDANT’S MOTION TO CONTINUE RULE 11**

The defendant, Bruce A. Brown (“Mr. Brown”), by and through undersigned counsel, hereby respectfully requests his change of plea hearing, currently scheduled for August 4, 2021, be continued for at least thirty (30) days. As grounds, Mr. Brown avers and states as follows:

Mr. Brown is detained, pending trial, at the Donald W. Wyatt Detention Facility in Central Falls, RI. Undersigned counsel visited with the defendant this past weekend, to obtain a signed copy of his anticipated plea agreement and review the mechanics/logistics of a Rule 11 hearing in advance of Wednesday’s expected change of plea. During this meeting, the defendant raised a mental health issue, indicating that he was in a mental health crisis due to a combination of the recent passing of his grandfather, Ernest Brown; uncertainty as to his young daughter’s care, and inability to communicate with her; and the stress of the case, itself. The defendant indicated that he would not be able to answer ready/able to complete the colloquoy required of a change of plea and asked undersigned counsel to request a continuance of the same to address the mental health issue(s) he raised.

Undersigned counsel has discussed this request with the government, pursuant to L.R. 7.1(a)(2). The Assistant U.S. Attorney does not object to Mr. Brown’s request for a short continuance.

WHEREFORE, defendant Bruce A. Brown respectfully requests his Rule 11 hearing be continued for a minimum of thirty (30) days so that he may address the mental health issue(s) he has raised.

Dated: August 3, 2021

Respectfully submitted,  
BRUCE A. BROWN  
By and through his attorneys,

/s/ Daniel C. Reilly  
Daniel C. Reilly, BBO#699663  
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**Certificate of Service**

I, Daniel C. Reilly, hereby certify that on this the 3<sup>rd</sup> day of August, 2021, I caused a true copy of the foregoing motion to be served upon all necessary parties to this matter by virtue of electronically filing the same via the CM/ECF system.

/s/ Daniel C. Reilly  
Daniel C. Reilly